

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

ROBERT G. LUSTYIK JR.,
JOHANNES W. THALER

Defendants,

Case No. 2:12-cr-00645-TC-DBP

**DEFENDANT'S JOINT MOTION FOR LEAVE TO FILE ITS MOTION(S) IN LIMINE
BY SEPTEMBER 10, 2014 WEDNESDAY INSTEAD OF SEPTEMBER 8, 2014 MONDAY**

Now come the defendants Robert Lustyik and Johannes Thaler by and through their undersigned counsel and respectfully requests this Honorable Court to grant it a two-day continuance in filing its motion(s) in limine until Wednesday, September 10, 2014 instead of the previously ordered date of Monday, September 8, 2014.

Both counsel were in travel status related to the instant case – Attorney Mansolillo was in New York with Investigator Mulcahy and client all day Wednesday, September 3, 2014 until 10:00 pm then both attorneys Mansolillo and Calabro had to travel to Washington, D.C. at the request of the government on Thursday, September 4, 2014 and Friday September 5, 2014 not returning home until after close of business on Friday. Both Mansolillo and Calabro will be returning to Washington, D.C. on Monday, September 8, 2014 to meet with the government and conduct a classified tele-conference at FBI Headquarters not returning again until after close of business same day, September 8, 2014.

For the aforementioned reasons, defendants jointly request said two-day extension to file motions in limine be granted and extended until September 10, 2014 Wednesday.

Respectfully Submitted,

Robert G. Lustyik, Jr.,
By his attorney,

/s/ Raymond Mansolillo

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Johannes W. Thaler,
By his attorney,

/s/ Daniel Calabro

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Certificate of Service

I, Raymond Mansolillo, hereby certify that on this 7th day of September, 2014, the aforementioned Joint Motion for Leave to File Its Motion(s) in Limine was electronically filed via ECF.

/s/ Raymond Mansolillo

Raymond Mansolillo